

February 2, 2000

Sent via e-mail and fax, hand delivery or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

re: Bell Atlantic's Section 271 Filing, D.T.E. 99-271

Dear Secretary Cottrell:

Pursuant to the Hearing Officers' January 31, 2000 Request for Comments, the Attorney General hereby submits his comments on AT&T's January 31, 2000 Emergency Motion to Stay Transaction Testing ("AT&T Motion"), together with a Certificate of Service. The Attorney General has completed his review of AT&T's Motion and, for the following reasons, urges the Department to grant AT&T's Motion to stay KPMG's testing of Bell Atlantic's operations support systems ("OSS") for ordering transactions until the Department resolves the procedural issue of how changes to the Master Test Plan ("MTP") should be handled.

On Friday, January 28, 2000, KPMG alerted the participating competitive local exchange carriers ("CLECs") and the Department during a conference call that KPMG intended to alter the terms of the MTP to test Bell Atlantic's pre-order and order systems based upon estimates of transaction volumes expected for six months from now rather than for eighteen months from now as ordered in the MTP (AT&T Motion at 5). In its January 31, 2000 Motion, AT&T asked the Department to stay testing of Bell Atlantic's OSS ordering transaction systems because KPMG did not notify the participants in writing of this proposed change (*id.* at 19-20). AT&T also asked the Department to reject this proposed change to the MTP because this change would, in effect, lower the test bar to a level of transaction volume below that which is anticipated in a more fully functioning competitive local service market (*id.*).

The Attorney General supports AT&T's request in regards to the procedural issue of how to change standards set forth in the MTP. The Attorney General submits that KPMG's unilateral attempt

to change a standard adopted in the MTP without prior written approval by the Department is inappropriate and should not be allowed. If KPMG believes that the MTP should be changed to allow a six-month level volume test, rather than an 18-month level volume test as required in the MTP, then the proper course is for KPMG to give written notice of a proposed change to all participants. No change should be allowed until the participants have an opportunity to comment on the proposed change and the Department decides whether it should be allowed.

In regards to the substantive issue raised by AT&T, i.e., whether the Department should stay testing of the ordering OSS systems until Bell Atlantic certifies that its OSS systems are operating correctly and can handle robust volume and stress testing, the Attorney General reserves his opinion until KPMG submits its written recommendations for the proposed change.

Sincerely,

Karlen J. Reed
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KJR/kr

cc: Cathy Carpino, Hearing Officer
Tina W. Chin, Hearing Officer
Service list for D.T.E. 99-271

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Inquiry by the Department of Telecommunications)	
and Energy pursuant to Section 271 of the)	
Telecommunications Act of 1996 into the Compliance)	D.T.E. 99-271
Filing of New England Telephone and Telegraph Company)	
d/b/a Bell Atlantic-Massachusetts as part of its application)	
to the Federal Communications Commission for entry into)	
the in-region interLATA (long distance) telephone market.)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding by e-mail and either hand delivery, mail, or fax.

Dated at Boston this 2nd day of February 2000.

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